

## Accuracy of Business Records

**Keep accurate records.** Create, maintain, modify and dispose of business records only in accordance with Aon policies. You are responsible for the integrity of all Aon business records that you help create or maintain, including time sheets, expense accounts and financial records. Never include any false or misleading information in any business records. Do not establish or maintain any Company accounts that are not recorded in the Company's books and records.

## Communicating with the Government and the Public

**At Aon we are committed to making full, fair, accurate, timely and understandable financial disclosures to governmental agencies**

**and the public.** Aon is a public company. As such, we must follow strict guidelines regarding the release of Company-related information to the public, including quarterly and annual reports to the United States Securities and Exchange Commission. To ensure that public disclosures are handled properly, the Law Department, Corporate Communications and/or Investor Relations coordinate all such disclosures.

All media requests should be forwarded to Corporate Communications.

## Political Activity

**Employees are encouraged to participate in personal political activity, but your involvement must be on an individual basis, on your own time and at your own expense.** In doing so, make it clear that your views and actions are your own and not those of Aon. Do not use Aon's assets or resources

for any political activities without the prior approval of the Law Department. Any employee running for public office, or wishing to engage in political activities or lobbying on behalf of Aon, must inform the Law Department.

### Subpoenas and Government Inquiries

Aon fully cooperates with requests for information from government officials. Contact the Law Department before responding to any government subpoenas or non-routine requests (including interview requests). If, after consulting with the Law Department, you provide information to a government representative, anything you provide must be truthful and complete. **Records or documents relevant to litigation or an investigation must never be altered, falsified, covered up, concealed, mutilated or destroyed.**

## Confidentiality of Company Information

**Keep all non-public information about Aon confidential.** Aon operates in highly competitive markets and has a vital interest in protecting non-public information. Non-public information includes any information about Aon, its customers or employees that might be harmful to them if disclosed, or useful to Aon's competitors. Such information includes, among other things, revenue and profit figures, financial reports, new product plans, marketing strategies and information relating to internal operations, future business plans, potential acquisitions, divestitures and investments.

## Corporate Authority

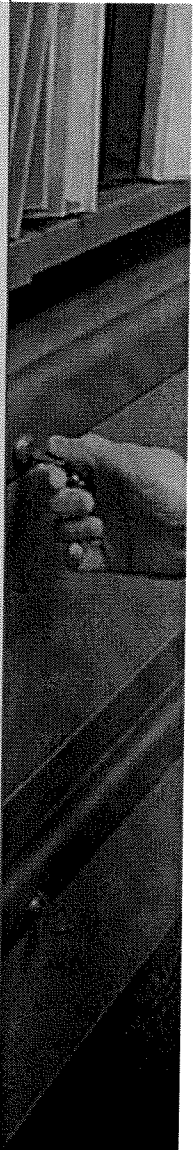
**Only make commitments you are authorized to make.** Business units have guidelines that outline the authority of employees to make commitments on behalf of the Company. Consult these guidelines, your manager or the Law Department before making commitments on behalf of the Company.

## Keep It Secure!

**Protect confidential information, whether it relates to the Company, our customers, or our co-workers.**

- Access it and share it with co-workers only on a need to know basis;
- Share it with non-Aon personnel only as legally required or as authorized in advance by Corporate Communications, Investor Relations or the Law Department;
- Password protect your computer and all sensitive documents;
- Lock confidential papers in your desk or cabinet before leaving your workstation; and
- Be careful not to discuss confidential information in a place where others may hear. Although there is often a temptation to discuss Aon with friends and family in relaxed and informal settings, remember that these rules apply in all situations.

The Company's information security policies and procedures include additional requirements for safeguarding information and information systems. Employees must carefully review and comply with these requirements (found on the Information Security Site on the Global Knowledge Exchange).





## Conclusion

While the Code sets forth the minimum standards of acceptable behavior, it is not intended to cover every issue that may arise. Your good judgment must always be your guide.

### How do I know the right thing to do?

It is not always easy to answer this question, and in some circumstances it can be extremely difficult. When things are "gray," ask yourself:

- Are there any laws, policies, or procedures that address this situation? What about the "spirit" of the law, policy, etc.?
- Am I looking at this situation objectively, or am I so emotionally involved that I should get help?
- What are the motivations of the others involved?
- How would I feel if my decision were featured on the front page of the newspaper?

If in doubt, seek guidance from your manager, the Ethics Helpline or any of the other resources listed in the back of this Code.

The Code is not solely about what Aon employees may and may not do. The Code is also about providing you with resources, to support you in doing the right thing. If you ever need help deciding how to handle a particular situation at work, need to report a situation, or need support in doing the right thing, the first place you should think to turn is your manager. If you do not feel comfortable going there, contact the Ethics Helpline or any of the other resources listed in the back of this Code.

**Remember, a good guideline is to act, at all times, in a manner that you would be proud to explain to your family and friends.**

## Helpful Resources

Employees should always feel free to discuss questions regarding the Code with their manager, local Human Resources representative, or local Law Department representatives. However, the following additional resources exist within Aon to assist you:

**Corporate Human Resources:**

+1.877.266.4677

**Corporate Information Security Helpline:**

+1.888.773.2547

**Corporate Law Department:**

+1.312.381.3017

**Corporate Compliance Department:**

+1.312.381.3328

**Corporate Employee Assistance Program:**

+1.800.510.9351 or +1.312.381.3218

**Corporate Director of Global Security  
and Crisis Management:**

+1.312.381.3100

**Non-management Directors  
of the Board of Directors:**

[www.aon.com](http://www.aon.com)

**Vice President – Internal Audit:**

through the Ethics Helpline

or by mail at

200 E. Randolph St.

Chicago, IL 60601

### Ethics Helpline:

The Ethics Helpline is available for questions and advice (about policies, laws, the right course of action) and for reports of possible violations (of this Code, Aon policies, or laws). The Helpline is operated by an independent third-party provider and callers to the Helpline may remain anonymous (caller ID is not used). The Helpline number is:

**+1.877.ETHICS6**

**(+1.877.384.4276)**

Reports and questions may also be submitted through a secure on-line reporting system found on the Global Knowledge Exchange.